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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARGUERITE BRATHWAITE, M.D., an
individual,

Plaintiff,

v.

SOUTHWEST MEDICAL ASSOCIATES,
INC., an active Nevada domestic Corporation;
DOES 1-10 and ROE ENTITIES 1-10,
inclusive.

Defendants.

Case No.: 2:22-cv-00729-JCM-NJK

**STIPULATION TO EXTEND THE
MARCH 22, 2024 DEADLINE TO
FILE DISMISSAL DOCUMENTS**

First Request

IT IS HEREBY STIPULATED by and between Plaintiff Marguerite Brathwaite, M.D., (“Plaintiff”), through her counsel F. TRAVIS BUCHANAN, ESQ., of the law firm F. TRAVIS BUCHANAN, ESQ., & ASSOCIATES, PLLC., and RODNEY S. DIGGS, of the law firm IVIE McNEILL WYATT PURCELL & DIGGS, and SOUTHWEST MEDICAL ASSOCIATES, INC., (“Defendant”) through its counsel JACKSON LEWIS P.C., that the current March 22, 2024, deadline to file dismissal paperwork be extended May 6, 2024.

1. On January 24, 2024, Magistrate Judge Koppe entered a report and recommendation that Defendant’s Motion to Enforce Settlement be granted. ECF No. 90.

1 2. On February 23, 2024, Judge Mahan entered an order adopting Magistrate Judge
2 Koppe's report and recommendation. ECF No. 99.

3 3. Judge Mahan further ordered the parties to submit the required dismissal paperwork
4 by March 22, 2024. ECF No. 99.

5 4. Following these orders, the parties began working on resolving the outstanding
6 disputes regarding the specific language in the settlement agreement. However, on or around March
7 12, 2024, an associate in the Las Vegas Office of Jackson Lewis, P.C. suffered a medical emergency
8 which unexpectedly requires an extended period of medical leave. This unexpected emergency has
9 required both counsels for Defendant to immediately begin work on other matters assigned to the
10 associate. As a result, the parties were unable to complete the final revisions to the settlement
11 agreement prior to March 22, 2024.
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13 5. The parties have recently resolved the disagreements regarding the specific language
14 and believe a finalized settlement agreement will be signed by both parties shortly. Following the
15 signing of the settlement agreement, payment will be completed and the parties will file a stipulation
16 for dismissal with prejudice. The parties anticipate this process will take approximately 30-45 days
17 to complete.
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6. Accordingly, the parties hereby stipulate and agree that the March 22, 2024, deadline to submit dismissal paperwork be extended to May 6, 2024.

7. This request is made in good faith and not for the purpose of delay.

DATED this 22nd day of March, 2024

F. TRAVIS BUCHANAN, ESQ., & ASSOC., JACKSON LEWIS P.C.
 PLLC

/s/ F. Travis Buchanan
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ORDER

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

Dated: March 22, 2024